

# EXHIBIT 82

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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In re FLINT WATER CASES

Civil Action No. 5:16-cv-10444-JEL-  
MKM (consolidated)

Hon. Judith E. Levy  
Mag. Mona K. Majzoub

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**DECLARATION OF CLYDE EDWARDS**

1. My name is Clyde Edwards and I am currently employed as the City Administrator for the City of Flint (“Flint”). I have knowledge about what has been known as the Flint Fast Action and Sustainability (“FAST”) Service Line Replacement Program (“Program”) and Flint’s CityWorks database (“Database”) and other Flint records and how the records and Database are used in the FAST Program.
2. As a result of the Flint Water Crisis, the Program was initiated and implemented to identify service lines connecting residences to Flint’s water system which were made of lead or galvanized iron and replace them. If the pipes were made of copper, they would not be replaced. Out of a total of approximately 55,893 parcels in Flint, approximately 28,400 were identified as occupied residential addresses potentially having lead service lines. As of December 25, 2020, a total of 26,750 service lines have been excavated and inspected through the FAST Program and a total of 9,912 have been replaced because they were made of lead or galvanized iron.
3. Flint hired private contractors to excavate and inspect service lines at the identified

residences. If the service lines were identified as being made of lead or galvanized steel, they were to be replaced. If the service lines were identified as being made of copper, they would not be replaced. The service line construction contractors were required to record the work done during the excavation and replacement process as part of the Program and provide that information to the project management team in place when the excavation and/or replacement occurred.

4. Attached as Exhibit 1 is a spreadsheet of the Program data dated November 28, 2018 which was generated by the project management team who had oversight and management responsibility for FAST Program as of that date.
5. Attached as Exhibit 2 is a spreadsheet of the Program data dated February 28, 2019 which was generated by the project management team who had oversight and management responsibility for FAST Program as of that date.
6. These spreadsheets, Exhibits 1 – 2, are true and accurate records of Flint which contain information recorded by the contractors hired by the Flint as part of the Program to conduct excavations of the service lines determine their composition and replace them if they are made of lead or galvanized iron. The spreadsheets include the following information as recorded by the contractors: (a) the street address, (b) the date on which the service lines were excavated and explored, (c) the composition of the public and private service lines, (d) whether replacement of the service lines was done, and (e) the date of the replacement if applicable
7. Exhibit 1A is a page from Exhibit 1 which contains information about the service lines located at [REDACTED] The record indicates that public and private service lines at that address were excavated and explored on September 10, 2018 and that they

were not replaced because they were made of copper.

8. Exhibit 2A is a page from Exhibit 2 which contains information about the service lines located at [REDACTED]. The record indicates that public and private service lines at that address were excavated and explored on February 5, 2019 and that they were not replaced because they were made of copper.

The facts stated in this Declaration are true and accurate based upon my own personal knowledge.

Date:

Jan 21, 2021

Clyde Edwards

Address of Service Line Exploration	Service Line Exploration Date	Service Line Exploration Public Composition	Service Line Exploration Private Composition	Service Line Portion Replaced	Service Line Replacement Date
	9/26/2018	Copper	Copper	No Replacement Required	
	8/17/2018	Copper	Copper	No Replacement Required	
	8/22/2018	Copper	Copper	No Replacement Required	
	9/27/2018	Copper	Copper	No Replacement Required	
	9/6/2018	Copper	Copper	No Replacement Required	
	11/14/2018	Copper	Copper	No Replacement Required	
	9/11/2018	Copper	Copper	No Replacement Required	
	8/16/2018	Copper	Copper	No Replacement Required	
	8/17/2018	Copper	Copper	No Replacement Required	
	8/29/2018	Copper	Copper	No Replacement Required	
	11/8/2018	Lead	Galvanized	Full Replacement	11/8/2018
	9/6/2018	Copper	Copper	No Replacement Required	
	10/3/2018	Copper	Copper	No Replacement Required	
	10/12/2018	Copper	Copper	No Replacement Required	
	8/28/2018	Copper	Copper	No Replacement Required	
	9/10/2018	Copper	Copper	No Replacement Required	
	8/29/2018	Copper	Galvanized	Partial Private Replacement	9/10/2018
	8/16/2018	Copper	Copper	No Replacement Required	
	9/27/2018	Copper	Copper	No Replacement Required	
	11/2/2018	Copper	Copper	No Replacement Required	
	8/27/2018	Lead	Galvanized	Full Replacement	8/27/2018
	9/6/2018	Copper	Copper	No Replacement Required	
	10/3/2018	Copper	Copper	No Replacement Required	
	8/16/2018	Copper	Copper	No Replacement Required	
	9/13/2018	Copper	Copper	No Replacement Required	
	11/12/2018	Copper	Copper	No Replacement Required	
	8/28/2018	Lead	Galvanized	Full Replacement	8/27/2018
	8/27/2018	Lead	Galvanized	Full Replacement	8/29/2018
	9/7/2018	Copper	Copper	No Replacement Required	
	9/13/2018	Copper	Copper	No Replacement Required	

Address of Service Line Exploration	Service Line Exploration Date	Service Line Exploration Public Composition	Service Line Exploration Private Composition	Service Line Portion Replaced	Service Line Replacement Date
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Non-Copper	Copper	Partial Public Replacement	2/5/2019
	2/5/2019	Non-Copper	Copper	Partial Public Replacement	2/5/2019
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Copper	Copper	No Replacement Required	
	2/5/2019	Non-Copper	Copper	Partial Public Replacement	2/5/2019
	2/5/2019	Non-Copper	Non-Copper	Full Replacement	2/5/2019
	2/5/2019	Non-Copper	Non-Copper	Full Replacement	2/5/2019